

STANDARD INFORMATION REQUIREMENTS FOR PUBLIC
UTILITIES FILING ELECTRONIC TARIFFS

**COMMENTS OF
NORTH SHORE GAS COMPANY
AND THE PEOPLES GAS LIGHT AND COKE COMPANY**

North Shore Gas Company (“North Shore”) and The Peoples Gas Light and Coke Company (“Peoples Gas”) (together, “North Shore/Peoples Gas”) submit their comments raised by the Staff of Illinois Commerce Commission (“Commission”) (“Staff”) in its email communication of September 23, 2016.

Staff sought comments on the following issues:

1. Tariff Withdrawal
2. Filing date/acceptance date/effective date
3. Signature on Tariff
4. Internal User Account
5. Filings permitted under the proposed rule.

These issues are addressed in turn below. Attachment A of these Comments shows revision marked versions of the draft rules for which North Shore/Peoples Gas propose changes.

I. Tariff Withdrawal

Staff proposed that withdrawal of a tariff filing would occur in a similar manner as the filing of a tariff. North Shore/Peoples Gas is in agreement with Staff and suggests a process where the utility, through the eTariff System, would submit the tracking number of the tariff to be withdrawn along with a cover letter indicating that the previously submitted electronic tariff filing should be withdrawn.

North Shore/Peoples Gas suggest the following addition to the proposed rule to allow for the withdrawal of tariffs:

Section XXX.80 Submission and Withdrawal of Tariffs Electronically

f) An authorized user may withdraw an electronic tariff filing by filing a transmittal letter identifying the electronic tariff to be withdrawn.

II. Filing date/acceptance date/effective date

a. Filing/Acceptance Date

The proposed rule at Section XXX.80(d) provides that a submission of an electronic tariff filing does not constitute acceptance of the electronic tariff by the Chief Clerk's Office. The filer's receipt of a tracking number also does not constitute acceptance of the electronic tariff filing. Section XXX.80(b). Acceptance of an electronic tariff filing only occurs on approval of the Chief Clerk's Office. Section XXX.80(d).

North Shore/Peoples Gas propose that, apart from situations where malware is present in the electronic tariff filing, the electronic tariff filing contains personally identifiable information (PII) or some other violation of Section XXX.60 occurs, all electronic tariff filings made by 3 p.m. Illinois local time, Monday through Friday (nonholidays) should be considered accepted by the Chief Clerk's Office. The 3 p.m. filing time will provide the filer a safe harbor to ensure that an Effective Date of a tariff can be readily determined, ensures that those tariffs that are required by a certain date by statute, rule or order meet the deadline, and provides the Chief Clerk's Office sufficient time for review and acceptance of the electronic tariff filing. North Shore/Peoples Gas suggest the following addition to the proposed rule:

Section XXX.80 Submission and Withdrawal of Tariffs

Electronically

- e) Electronically filed tariffs made on a business day before three o'clock p.m. (3:00 p.m.), shall be deemed accepted by the Chief Clerk's Office as of that date, to the extent that the electronically filed tariff is not in violation of Section XXX.60. Also, electronically filed tariffs actually accepted by the ICC Chief Clerk's Office before five o'clock p.m. (5:00 p.m. ~~EST~~Illinois Local Time) shall be deemed accepted as of that date. Electronically filed tariffs accepted by the Chief Clerk's Office at or after five o'clock p.m. (5:00 p.m. ~~EST~~Illinois Local Time) shall be deemed accepted as of the next scheduled business day.

b. Effective Date

As discussed in the first workshop acceptance of an electronically filed tariff by the Chief Clerk's Office "starts the clock" for determining the Effective Date of that tariff. Some parties raised the possibility that the tariff could be "post-dated." So, while the electronically filed tariff would accepted by the Chief Clerk's Office, the schedule for a change in a tariff would not begin until the day of the "post-date" as designated in the electronically filed tariff. North Shore/Peoples Gas supports the use of a "post-date" as an alternative and in addition to the use of the day of acceptance of the electronically filed tariff by the Chief Clerk's Office. *Note however, this proposal may conflict with 83 IAC 255.30(e)(6).*

North Shore/Peoples Gas suggest the following addition to the proposed rule:

Section XXX.70 Required Information

(b) (5) Subject to the limitation that the earliest date for acceptance shall occur on the Chief Clerk's Office acceptance of the filing, the Public Utility may provide an alternative, later, post-dated date that shall be considered the acceptance date for purposes of determine the Effective Date of the tariff.

III. Signature on Tariff

North Shore/Peoples Gas proposes that the "/s" electronic signature be accepted as a valid signature in those cases where the Authorized User has a written signature on file with the Commission. If the Authorized User does not have a written signature on file with the Commission, a hand-written signature of the Authorized User, which may be affixed to the cover letter electronically, shall be used.

IV. Internal User Account

North Shore/Peoples Gas agrees with Staff's position expressed in the email of September 23, that Section XXX.50(b) should be modified to provide:

Section XXX.50 Electronic Tariff Filing Accounts

- (b) A ~~notarized and completed~~ ICC external user account application must be ~~hand-delivered or mailed~~ provided to the Chief Clerk's Office in accordance with the instructions provided on the form.

As to the issue of revocation of the authority of an Authorized User Account, North Shore/Peoples Gas supports that either e-mail or a phone call from a utility representative should be sufficient to revoke authorization.

V. Filings permitted under the proposed rule.

North Shore/Peoples Gas proposes that, to the extent a definition of "tariff" is required in the context of what may be filed as an eTariff in the proposed rule, the eTariff System should allow for the filing of Tariffs and information sheets.

VI. Other topics

North Shore/Peoples Gas proposes edits to Section XXX.70, Required Information (d)(4) to clarify the utility's ability to continued interest in its work papers.

North Shore/Peoples Gas has attached its proposed edits to the Rule.